

# **EXHIBIT 1**

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2                   **DECLARATION OF ROY E. MILLER**  
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5                   I, ROY MILLER, say and declare as follows:  
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8                   1. I am an individual over 18 years of age and competent to make this Declaration.  
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11                  2. If called upon to do so, I could and would competently testify as to the facts set forth in  
12 this Declaration.  
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14                  3. The facts set forth below are true of my personal knowledge.  
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16                  4. I am an attorney at law duly admitted to practice before this Court and courts of the  
17 State of California.  
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19                  5. I am an attorney with the law firm of Hansen & Miller, attorneys of record for  
20 thousands of victims of the fires started by PG&E in 2017 (the twenty fires generally referred to  
21 as the “North Bay”), 2018 (“Camp Fire”) and 2019 (“Kincade Fire”).  
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23                  6. I make this Declaration in support of the motion to allow late filing of proofs of claim  
24 (“Motion”) on behalf of Trinidad and Robin Sandoval (collectively “Movants”), whom lost their  
25 respective homes in the Tubbs Fire. Trinidad and Robin Sandoval are jointly represented by  
26 Watts Guerra LLP and Hansen & Miller.  
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28                  7. These clients did not have a claim filed before the December 31, 2019 claims bar date  
29 due to excusable neglect and should be allowed to file a proof of claim after the bar date.  
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31                  8. On December 20, 2019, Hansen & Miller’s offices were closed for its annual firm  
32 Christmas party. Trinidad and Robin Sandoval came by the office to sign up to become clients for  
33 a PG&E claim. They owned a home in Coffee Park and their home and belongings were  
34 destroyed in the Tubbs Fire. The office door was unlocked (as the office was closed for the  
35 holiday party) and one of the legal assistants left the party in the firm’s offices and met with the  
36 Sandoval’s. They provided information, copies of drivers licenses, and signed fee agreements.  
37 The Sandoval’s left, and the legal assistant misplaced the documents and they were not handled  
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based on the established written firm protocol. As a result the Sandoval's paperwork was filed without having their claim first submitted for processing. Thus the Sandoval's took action necessary to have a claim prior to the deadline, but it was not discovered until a few days after the deadline that their claims were not filed. The Sandoval's acted timely and their claim was not filed due to excusable neglect.

9. On February 26, 2020, Watts Guerra LLP and Hansen & Miller filed claim numbers 97027 and 97032 on behalf of the Movants (“Subject Proofs of Claims”). True and correct copies of the Subject Proofs of Claims are attached collectively hereto as Exhibit A.

I declare under penalty of perjury under the laws of the State of California that the forgoing is true and correct and executed this 26<sup>th</sup> day of May 2020.

/s/ Roy Miller  
Roy Miller